



## Napa Valley Grapegrowers

811 Jefferson Street • Napa, California 94559

707.944.8311 (t) • 707.224.7836 (f)

[www.napagrowers.org](http://www.napagrowers.org)

August 23, 2005

Chief, Regulations and Procedures Division  
Alcohol and Tobacco Tax and Trade Bureau  
ATTN: Notice No. 49  
P.O. Box 14412  
Washington, D.C. 20044  
Email: [nprm@ttb.gov](mailto:nprm@ttb.gov)

The Napa Valley Grapegrowers (NVG) represents over 450 growers and industry affiliates, and is active at local, state, and federal levels in advocating for grape growers. NVG works to promote and protect the Napa Valley wine industry, and the communities that it supports. After careful review of the TTB proposal to reduce vintage dating requirements, we write to strongly OPPOSE any change to the current requirements for vintage dated wine.

1. Lowering the percentage requirement will lessen both the quality of wine and, as important, the *perception* of the quality of California wines. The initiative will provide latitude for producers to seek and include greater quantities of bulk wine into their blends. This provides a disincentive for grape growers to produce top-quality fruit, thereby eroding the quality and integrity of the final product. It may result in bulk wine of lesser quality being included in vintage dated bottles. Ultimately, this puts growers at a disadvantage, and is misleading to consumers.
2. We do not believe that lowering the requirement to 85% will make us more competitive in international markets or let us better compete with international wine brands sold here. We would prefer to see TTB enforce the *existing* U.S. regulations regarding percentage requirements.
3. This proposed reduction will cost the state's growers over \$100 million in deferred purchases and payments for grapes, including the high risks and costs of producing bulk wine for the open market.

The NVG encourages you to reject the proposal to reduce vintage dating requirements. The California wine industry's \$45 billion contribution to the state's economy will quickly decline if grape growers are unable to successfully grow and sell premium California winegrapes.

Sincerely,

Eric Titus, President

*Fine Wine Begins in the Vineyard*